

210 N. Park Ave.

Winter Park, FL

32789

February 6, 2006 Via ECFS

P.O. Drawer 200

Winter Park, FL

32790-0200

Ms. Marlene H. Dortch, Secretary Federal Communications Commission

445 12th Street SW

Washington, DC 20554

Tel: 407-740-8575

Fax: 407-740-0613

tmi@tminc.com

RE:

ITI Inmate Telephone, Inc.

Docket 06-36

EB-06-TC-060 – Certification of CPNI Filing - (02/06/06)

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, ITI Inmate Telephone, Inc. hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in Docket 06-36.

Any questions you may have regarding this filing may be directed to me at 407-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes

Consultant to ITI Inmate Telephone, Inc.

Mr. Byron McCoy, byron.mccoy@fcc.gov cc:

Best Copy and Printing, Inc., fcc@bcpiweb.com

ANNUAL OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

I, James C. Faith, Vice President of ITI Inmate Telephone, Inc. certify and state that:

- 1. I have personal knowledge of the ITI Inmate Telephone, Inc. operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, ITI Inmate Telephone, Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Communication's rules found in 47 CFR, Subpart U.
- 3. A further statement outlining the operating procedures and compliance of Public Communications Services, Inc. is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)

James C. Frith, Vice President ITI Inmate Telephone, Inc.

3/6/2006 (Date)

Attachment A Statement of CPNI Procedures and Compliance ITI Inmate Telephone, Inc.

Statement of CPNI Procedures and Compliance

ITI Inmate Telephone, Inc. ("ITI") operates solely as an provide of inmate operator services and as such provides only operator assisted call completion services to inmates of confinement institutions. Therefore, all of its services are provided outside of any subscribed service relationship and it does not obtain any CPNI. The only information the company has access to is the raw call record containing the call-from number, the call-to number, the bill-to number, and the duration of the call. The company does not have any information about the individual calling or called party. Calls are either billed by the local exchange carrier or provided on a prepaid basis only. Calls that cannot be billed through either of those methods are billed directly by the company on a per call basis aggregated throughout a given monthly billing period.

Since ITI does not have any CPNI, it therefore cannot use or permit access to CPNI. Moreover, ITI does not market its services to end users in any fashion. Its marketing efforts are directed towards inmate confinement/correctional facilities, and such efforts do not include the use of CPNI.

Should ITI expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Requests for raw call records by law enforcement agencies are only granted if a subpoena is provided.